Case 18-21729-CMB Doc 104 Filed 11/27/19 Entered 11/27/19 11:26:11 Desc Main

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Bankruptcy No. 18-21729-CMB
Kerry Patrick Seifen and	<i>)</i>) Chapter 13
Luann Ellen Seifen)
Debtors,)
Shellpoint Mortgage Servicing)
Movant,	Related Claim No. 10-1
vs.)
Kerry Patrick Seifen and	
Luann Ellen Seifen)
Ronda J. Winnecour, Chapter 13Trustee,	
Respondents) Document No.

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtors, Kerry Patrick Seifen and Luann Ellen Seifen, by and through their attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

- 1. The Debtors, Kerry Patrick Seifen and Luann Ellen Seifen, commenced this case on May 1, 2018, by filing a Chapter 13 petition.
- 1. The Movant filed a Notice of Mortgage Payment Change on November 9, 2019 due to a \$0.85 increase per month in the escrow account.
- 2. The Debtors' are currently paying the mortgage pursuant to a permanent loan modification that was approved by this court.
- 3. There is no need to amend the confirmed plan for a yearly increase of \$10.20.

Respectfully submitted,

DATED: November 27, 2019 **BY:** /s/ David Z. Valencik

David Z. Valencik, Esquire, PA I.D. #308361

dvalencik@c-vlaw.com

CALAIARO VALENCIK 938 Penn Avenue, Suite 501 Pittsburgh, PA 15222-3708

(412) 232-0930

Case 18-21729-CMB Doc 104 Filed 11/27/19 Entered 11/27/19 11:26:11 Desc Main Document Page 2 of 2

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Bankruptcy No. 18-21729-CMB
Kerry Patrick Seifen and) Chapter 13
Luann Ellen Seifen)
Debtors,)
Shellpoint Mortgage Servicing)
Movant,	Related Claim No. 10-1
vs.)
Kerry Patrick Seifen and)
Luann Ellen Seifen	
Ronda J. Winnecour, Chapter 13Trustee,)
Respondents.) Document No.

CERTIFICATE OF SERVICE OF DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on May 29, 2019.

Service by First Class Mail:

Kerry & Luann Seifen 124 S. Jefferson Ave Canonsburg, PA 15317

Service by NEF:

Ketan Sawarkar, Claims Processor AlS Portfolio Services, LP PO Box 201347 Arlington, TX 76006

Office of the U.S. Trustee, 1001 Liberty Avenue, Liberty Center, Suite 970, Pittsburgh, PA 15222

Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at cmecf@chapter13trusteewdpa.com

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: 5/30/19 /s/ David Z. Valencik

David Z. Valencik, Esquire, PA I.D. #308361

dvalencik@c-vlaw.com/s/ Donald R. Calaiaro

Donald R. Calaiaro, Esquire, PA I.D. #27538

dcalaiaro@c-vlaw.com

CALAIARO VALENCIK 938 Penn Avenue, Suite 501 Pittsburgh, PA 15222-3708 (412) 232-0930